

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

First-Class Package Service (FCPS)
Service Standard Changes, 2021

Docket No. N2021-2

PUBLIC REPRESENTATIVE'S FIRST SET
OF INTERROGATORIES AND REQUESTS FOR PRODUCTION TO
UNITED STATES POSTAL SERVICE WITNESS THOMAS J. FOTI
(PR/USPS-T-3)

(July 8, 2021)

Pursuant to 39 C.F.R. §§ 3020.117 and 3020.118, the Public Representative hereby submits the following interrogatories and requests for production of documents. Please refer to the testimony of Witness Thomas J. Foti.¹

The Public Representative encourages the Postal Service to discuss issues of burden, privilege, relevance, or questions of clarity informally to obviate the need for objections or motions practice.

Respectfully Submitted,
/s/ Mallory L. Smith
Public Representative for
Docket No. N2021-2

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¹ See Notice of Filing Direct Testimony of Thomas J. Foti on Behalf of the United States Postal Service (USPS-T-3), June 17, 2021.

1. Please see Attachment, filed under seal